

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

CYTIVA SWEDEN AB, and	)	
GLOBAL LIFE SCIENCES	)	
SOLUTIONS USA, LLC,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	C.A. No. 18-1899-CFC-SRF
	)	
BIO-RAD LABORATORIES, INC.,	)	<b>CONSOLIDATED</b>
	)	
Defendant.	)	

**PLAINTIFFS' MOTION TO EXCLUDE EXPERT OPINIONS  
OF DR. THOMAS KEARL**

Pursuant to Federal Rule of Evidence 702 and Federal Rule of Evidence 703, Plaintiffs Cytiva Sweden AB and Global Life Sciences Solutions USA LLC (collectively, "Plaintiffs") file this motion to exclude the expert opinions, testimony, and/or any calculations of Dr. Thomas Kearl that are based on prior license agreements that have no technical comparability to the Asserted Patents, incorporated in his Rebuttal Expert Report at paragraphs 119-124, 136, 138, Table 4, and Exhibit F. The grounds for this Motion are set forth in Plaintiffs' Opening Brief in Support of Motion to Exclude Expert Opinions and the supporting Declaration of Amy DeWitt and exhibits, filed concurrently.

NOW, THEREFORE, Plaintiffs respectfully request that the Court grant this Motion in the form of the Proposed Order attached as Exhibit A.

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\*Admitted in NY and CA only;  
practice limited to matters before  
federal courts and federal agencies

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